

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re Terrorist Attacks on September 11,  
2001**

**03 MDL 1570 (GBD)(SN)  
ECF Case**

**This document also relates to member case:**

*Marie Laure Anaya, et al. v. Islamic Republic of Iran*, 1:18-cv-12341 (GBD) (SN)

**NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL JUDGMENT  
FOR SOLATIUM FOR NON-IMMEDIATE FAMILY MEMBER**

**(ANAYA/IRAN VI)**

**PLEASE TAKE NOTICE** that, by and through their undersigned counsel and upon the accompanying Memorandum of Law, the Declaration of Joseph Peter Drennan, executed on 5 September 2023, together with the Exhibits annexed thereto, and all prior pleadings and proceedings had herein, *Anaya/Iran* Plaintiff Kathleen Marie Delatizky respectfully moves this Court for an Order awarding:

- (1) solatium damages to Kathleen Marie Delatizky for the losses she suffered as a stepchild of the late Richard Bradway Hall, in the same amount previously awarded to similarly-situated stepchildren of other decedents killed in the terrorist attacks on 11 September 2001; and
- (2) prejudgment interest on such damages at the rate of 4.96 percent per annum, compounded annually for the period from 11 September 2001, until the date of the judgment; and
- (3) permission for Kathleen Marie Delatizky to seek punitive damages or other damages at a later date; and
- (4) permission for all other *Anaya/Iran* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; and
- (5) such other and further relief as this Honorable Court deems just and proper.

This motion is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on 5 October 2021 (ECF 70 in 18-cv-12341 and ECF 7178 in 03-MDL-1570).

Dated: 5 September 2023  
White Plains, New York

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